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Attorneys for Crowley Marine Services, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

GARY J. CROCHET,

Plaintiff,

vs.

CROWLEY MARINE SERVICES, INC.

Defendant.

Case No. 3:05-cv-0288-TMB

MOTION TO AMEND ANSWER

Comes now, Defendant Crowley Marine Services, Inc. ("Crowley") and moves the court pursuant to the provisions of Fed.R.Civ.P. 15(a) for leave to amend its answer to assert an additional affirmative defense that plaintiff's claims for payment of "voyage continuation wages" are preempted by operation of law in accordance with §301 of the Labor Relations Management Act, 29 U.S.C. §185, and barred by expiration of the six month statute of limitations applicable to such claims.

1 This motion is supported by the attached memorandum.

2 DATED at Anchorage, Alaska this 3rd day of April, 2006.

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4 KEESAL, YOUNG & LOGAN
Attorneys for Crowley Marine Services, Inc.

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10 CERTIFICATE OF SERVICE:

11 I HEREBY CERTIFY THAT I CAUSED TO
12 BE SERVED A TRUE AND CORRECT COPY
OF THE FOREGOING THIS 3RD DAY OF
APRIL, 2006 TO:

13 Via Mail

14 Heather L. Gardner
15 Law Office of Michael J. Patterson
810 W. 2nd Avenue
16 Anchorage, AK 99501

17 s/ DOUGLAS R. DAVIS
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